IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:15-cv-193

KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com, **Plaintiff,** **vs.** **HAGIT ROCKAH, JACOB STINER, TZAHI ROZENTAL, ITZHAK HAREL, PNINA SORASKI, HAVA LIPCER, SIGALIT RAHAT, DEMYAN MICHAELI, EREZ SHAKED, MENAHEM LIPCER, RIVKA HAIMOVITZ, OSHRIT MARCIANO, BARUCH HEYMAN, SHEMUEL COHEN, ILAN DORON, and MESHULAM SHAPIRA,** **Defendants.**	CERTIFICATION AND REPORT OF F.R.C.P. 26(f) CONFERENCE AND DISCOVERY PLAN

1. Certification of Conference. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on Wednesday, October 19, 2016, by the undersigned counsel. As discussed during the conference, the parties agree to and propose the following for consideration by the Court:

2. Pre-Discovery Disclosures. The information required by Fed. R. Civ. P. 26(a)(1) will be exchanged within 30 days of the Court's entry of the Scheduling Order.

3. Discovery Plan.

a. All discovery shall be commenced in time to be completed by January 30, 2017.

b. Discovery Limits:
i. Maximum of 20 interrogatories by each party.
ii. Maximum of 20 requests for admission by each party.
iii. Maximum of 6 depositions may be taken by each party.

c. Reports from retained experts under Rule 26(a)(2) will be due

i. The Plaintiff's expert report, if any, shall be due by October 28, 2016.
ii. Defendants' expert report, if they decide to retain one or more experts, shall be due by November 30, 2016.
iii. The Defendant's and Receiver's rebuttal reports, if any, shall be due by December 30, 2016.
iv. Supplementations under Rule 26(e) shall be due by December 30, 2016.

4. Other Items.

a. The parties [ ] request [X] do not request a conference with the court before entry of the scheduling order.

b. All potentially dispositive motions should be filed by February 28, 2017.

c. Settlement:
[ ] is likely
[ ] is unlikely
[x] cannot be evaluated prior to initial discovery review.
[ ] may be enhanced by use of the following ADR procedure:
[ ] Mediated Settlement Conference
[ ] binding arbitration
[ ] judicial settlement conference
[ ] other ________________________________

The parties agree that the above selected ADR procedure would be most useful if conducted:

[ ] after resolution of any outstanding dispositive motions, but prior to further discovery;
[ ] after an initial round of preliminary discovery to be completed by ___;
[x] after the completion of discovery;
[ ] after resolution of summary judgment motions, if any;
[ ] not applicable.

d. Final lists of witnesses and exhibits under Rule 26(a)(3) are due:

i. from plaintiff 30 days prior to trial if the case is ultimately tried.
ii. from defendants one week after plaintiff submits a final list.

e. If the case is ultimately tried, trial is expected to take approximately 5 days.

f. [x] The parties have discussed the issue of consent to the jurisdiction of a U.S. Magistrate Judge.

5. Please identify any other matters regarding discovery or case management which may require the Court's attention (e.g., concerns re: confidentiality, protective orders, etc., unmovable scheduling conflicts):

The Protective Order issued by the Court in the case of *Securities and Exchange Commission v. Rex Venture Group, LLC d/b/a ZeekRewards.com et al.*, No. 3:12-cv-519, governs the parties in this case. A copy of the Protective Order has been provided to all parties.

Respectfully submitted,

/s/ Matthew E. Orso_____ Matthew E. Orso (NC Bar No. 42409) McGuireWoods LLP 201 North Tryon Street, Suite 3000 Charlotte, North Carolina 28202 (704) 343-2000 Fax: (704) 373-8836 Email: morso@mcguirewoods.com *Counsel for Plaintiff*	/s/ J. Kevin Edmundson J. Kevin Edmundson EDMUNDSON PLLC 21209 Highway 71 West, Suite 3 Spicewood, Texas 78669 (512)720-0782 Email: kevin@edmundsonpllc.com *Counsel for Defendants*